

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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ALINA AHMED, f/k/a Ruchi Diwan,

13-CV-3353 (CBA)(RER)

Plaintiff,

-against-

SUBZI MANDI, INC., and  
JAGIR SINGH,

Defendants.

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**AFFIRMATION IN SUPPORT OF  
DAMAGE CALCULATIONS AND  
REASONABLE ATTORNEYS' FEES**

Arthur H. Forman, an attorney duly admitted to practice before this Court and the courts of the State of New York, affirms the truth of the following under penalty of perjury:

1. I am the attorney for the plaintiff, Alina Ahmed in the above captioned action.
2. This Court has declared Defendants in default, having failed to serve an answer or otherwise move with respect to Plaintiff's complaint. Pursuant to the Court's rules, this affirmation and the accompanying exhibit are submitted in support of damage calculations of Plaintiff, Alina Ahmed and for reasonable attorneys' fees.
3. The back wages owed to Plaintiff amount to \$6,695.75 and are fully explained in the Affidavit of Plaintiff, Alina Ahmed, in Support of Plaintiff's Motion for Default Judgment.
4. The time records prepared by my office with respect to this matter are attached hereto as Exhibit 1.
5. All of the time recorded on Exhibit 1 was incurred reasonable and necessarily in pursuit of this case.
6. I customarily bill my clients at a rate of \$300.00 per hour for my services. Calculated at the hourly rate of \$300.00, my attorney fees in this matter total \$4,470.00 for the 14.90 hours I spent on this action, including preparing and filing the instant motion for default judgment.

7. In addition, Plaintiff actually expended \$450.00 in litigation costs, consisting of \$400.00 for the court filing fee, and \$50.00 to the process server to serve a summons and copy of the complaint on both the corporate defendant and the individual defendant in this action.

8. I am, and since approximately 1992 have been, a sole practitioner. I received a JD degree from Boston University School of Law in 1980, and was admitted to the bar of the State of New York in 1981. I was admitted to both the Eastern District and the Southern District in 1984, and have been an attorney in good standing in both courts to date. ECF of this court lists fifty-five cases in which I was the sole or lead attorney for one of the parties, and ECF in the Southern District lists thirty-seven cases in which I was the sole or lead attorney for one of the parties. In addition, since 1981 I have represented litigants in the New York City Civil Court and New York State Supreme Court. I have also represented parties in appeals before the Appellate Division of the New York State Supreme Court, as well as the Second Circuit. Since approximately 1999 I have limited my practice to employment law, representing parties in discrimination cases, wage claims, and other employment law matters before the aforestated courts, as well as administrative agencies including the Merit System Protections Board, the National Labor Relations Board, the New York State Public Employment Relations Board, The New York City Civil Service Commission, the New York State Division of Human Rights and the New York City Commission on Human Rights.

Dated: November 1, 2013  
Forest Hills, New York

/S/  
Arthur H. Forman